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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF ADMINISTRATIVE
MOTION TO FILE EXCESS PAGES AND
TO ESTABLISH PRIVILEGE BRIEFING
SCHEDULE**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), interim lead counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and, if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. § 1746 and Local Rule 6-3 in support of Plaintiffs’ Administrative Motion to File Excess Pages and to Establish Privilege Briefing Schedule.

2. On November 6, 2024, Judge Chhabria issued an order extending the deadline for submitting letter briefs on existing written discovery to November 8, 2024.

3. On November 5, 2024, I emailed counsel for Meta indicating Plaintiffs’ intention to file a brief addressing outstanding privilege-related disputes in this proceeding. These disputes were identified by Plaintiffs in an October 23, 2024 letter, and were responded to by Meta on November 1, 2024.

4. The parties subsequently engaged in extensive negotiations by email and telephone regarding the schedule for submitting a letter brief on the privilege issues. Plaintiffs expressed conceptual agreement with Meta’s proposal to file sequential, rather than joint, briefing, with Plaintiffs’ brief due November 8 and Meta’s brief due November 14. The parties also had some conceptual agreement on extending page lengths, with Meta ultimately offering a proposal that involved, among other terms, 10 pages for the opening and response letter briefs.

5. Despite the parties’ efforts, Plaintiffs and Meta were unable to reach a resolution regarding the briefing format for the privilege issues. Plaintiffs file this Administrative Motion, along with their portion of the privilege letter brief, due to the November 8, 2024 deadline to bring such disputes to the Court’s attention.

6. Attached as **Exhibit A** is a true and correct copy of emails between Plaintiffs’ and Meta’s counsel regarding negotiations of a stipulated procedural schedule, dated October 11, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 8th day of November, 2024, in San Francisco, California.

By: */s/ Maxwell V. Pritt*
Maxwell V. Pritt